

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Boston Edison Company)
Cambridge Electric Light Company)
Commonwealth Electric Company)

D.T.E. 03-121

**NSTAR ELECTRIC FIRST SET OF INFORMATION REQUESTS TO THE
CONSERVATION LAW FOUNDATION**

Instructions

The following instructions apply to this set of information requests and all subsequent information requests issued by NSTAR Electric in this proceeding.

1. Each request should be answered in writing on a separate page (paginated) with a recitation of the request, the identification number of the request (for example, NSTAR-CLF-1-1), the docket number of the case, the date of the response, and the preparer of the response or the name of the person responsible for the answer. Please mark each page of an answer with the identification number of the request. In addition, please clearly reference any attachments to a response with the number of the request to which it applies and include page numbers on all attachments.
2. Please do not wait for all responses to be completed before supplying answers, but instead please provide the answers as they are completed.
3. These information requests shall be deemed continuing in nature so as to require further supplementation if CLF or its witness receive or generate additional information within the scope of those requests between the time of the original response and the close of the record in these proceedings.
4. The terms used interchangeably within these information requests relating to "any and all", "documentation", "support", and "justification" mean provide all data, assumptions, and calculations relied on. Provide the source of and basis for all data and assumptions employed. Include all studies, drafts, memos, reports, and planning documents from which such data, estimates and assumptions were used. Provide and explain any and all supporting workpapers.
5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phonographic records,

microfilm, microfiche, computer printouts, memoranda, letters, correspondence, handwritten notes, records and reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

6. If the Respondent believes that any of these information requests are ambiguous or need clarification, please contact David Rosenzweig or Stephen August at (617) 951-1400 so that the requests can be clarified prior to the preparation of a written response.
7. If an answer provides a reference to another information response, please provide that response with the answer.
8. If a question refers to an information request of another party, please provide an answer with information that supplements the previous responses.

Information Requests

Information Requests Relating to the Pre-Filed Testimony of Mr. Michelman

- NSTAR-CLF-1-1 Please provide copies of (1) any and all prefled testimony or reports (including all associated exhibits and attachments) submitted by Mr. Michelman to state and federal regulatory authorities from 1999 to the present; and (2) any and all transcripts of Mr. Michelman's testimony at hearings (adjudicatory or non-adjudicatory) before state and federal regulatory authorities from 1999 to the present.
- NSTAR-CLF-1-2 Provide copies of any and all regulatory decisions addressing the issues covered by Mr. Michelman in testimony provided in response to Information Request NSTAR-CLF-1-1. Identify the decision making authority, docket number, year of the decision, and any official citation to the decision.
- NSTAR-CLF-1-3 Please identify all documents relied upon by Mr. Michelman in preparing this testimony. Please provide a copy of each identified document.
- NSTAR-CLF-1-4 Please provide a copy of any and all articles, papers, speeches or other reports prepared in whole or in part by Mr. Michelman addressing, distributed generation, standby rates and/or rate design.
- NSTAR-CLF-1-5 Identify each Boreal client in the NSTAR Electric service territory that has installed a wind turbine. List: (1) the size of

each wind turbine(s); (2) the location of the project; (3) the annual amount of electricity generated by each unit since its installation; and (4) the monthly peak loads for each project since coming into operation.

- NSTAR-CLF-1-6 Provide all correspondence from or to Boreal or Thomas S. Michelman, Inc. concerning NSTAR Electric's proposed rates in this proceeding.
- NSTAR-CLF-1-7 Provide a copy of all presentations made by Boreal or Thomas S. Michelman, Inc. concerning NSTAR Electric's proposed rates in this proceeding.
- NSTAR-CLF-1-8 Provide copies of all documents, studies, reports or other information sent by Boreal or Thomas S. Michelman, Inc. to its clients or potential clients concerning NSTAR Electric's proposed rates in this proceeding.
- NSTAR-CLF-1-9 Referring to page 3, lines 9-13, to the extent that wind DG is an intermittent technology, please explain whether, under the current rate structure for the NSTAR Electric distribution companies (i.e., taking standby service pursuant to the otherwise available rate), a customer with a wind DG would be likely to incur a demand charge each month for the maximum 15-minute demand imposed on the NSTAR Electric system. Please provide all documents, assumptions and analyses in support of the response.
- NSTAR-CLF-1-10 Referring to page 8, lines 6-7 of Mr. Michelman's testimony, please describe the basis for the assumption that wind is randomly distributed over all hours of the year. Please provide all documents, studies and other analyses that relate to the assumption.
- NSTAR-CLF-1-11 Referring to Exhibit CLF/SEBANE-TSM-3 (Exhibit 1), please provide: (a) a detailed explanation of each calculation that resulted in the values set forth in the table; and (b) a copy of all calculations, workpapers, spreadsheets or other documents that show each calculation that resulted in the values set forth in the table. The copy should be provided both in paper form and electronically. The electronic version should be in Excel format and show all inputs, formulas and linked sources.
- NSTAR-CLF-1-12 Referring to Exhibit CLF/SEBANE-TSM-4 (Exhibit 2), please provide: (a) a detailed explanation of each calculation that resulted in the values set forth in the table; and (b) a copy of all calculations, workpapers, spreadsheets or other documents that

show each calculation that resulted in the values set forth in the table. The copy should be provided both in paper form and electronically. The electronic version should be in Excel format and show all inputs, formulas and linked sources.

- NSTAR-CLF-1-13 Referring to Exhibit CLF/SEBANE-TSM-5 (Exhibit 3), please provide: (a) a detailed explanation of each calculation that resulted in the values set forth in the table; and (b) a copy of all calculations, workpapers, spreadsheets or other documents that show each calculation that resulted in the values set forth in the table. The copy should be provided both in paper form and electronically. The electronic version should be in Excel format and show all inputs, formulas and linked sources.
- NSTAR-CLF-1-14 Referring to Exhibit CLF/SEBANE-TSM-6 (Exhibit 4), please provide: (a) a detailed explanation of each calculation that resulted in the values set forth in the table; and (b) a copy of all calculations, workpapers, spreadsheets or other documents that show each calculation that resulted in the values set forth in the table. The copy should be provided both in paper form and electronically. The electronic version should be in Excel format and show all inputs, formulas and linked sources.
- NSTAR-CLF-1-15 Referring to Exhibit CLF/SEBANE-TSM-7 (Exhibit 5), please provide: (a) a detailed explanation of each calculation that resulted in the values set forth in the table; and (b) a copy of all calculations, workpapers, spreadsheets or other documents that show each calculation that resulted in the values set forth in the table. The copy should be provided both in paper form and electronically. The electronic version should be in Excel format and show all inputs, formulas and linked sources.
- NSTAR-CLF-1-16 Please provide all documents, studies and other analyses that identify the average load factor for wind turbine DG customers for that portion of the load that is equal to the name-plate capacity of the wind turbines.